

January 15, 2025

Via ECF

Hon. Stewart D. Aaron
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Lee v. HDR Global Trading Ltd. et al.*, No. 1:20-cv-3232 (ALC) (SDA)

Dear Judge Aaron:

Pursuant to the Court's Order dated November 15, 2024, 2024 (ECF No. 224), all parties in the above-referenced matter respectfully submit this joint letter to apprise the Court of the status of discovery.

The parties are working in good faith to advance the completion of discovery in this matter, pursuant to the Amended Fact Discovery Schedule ordered by the Court on November 12, 2024 (ECF No. 222).

With respect to document discovery, the parties have made significant progress and substantial discovery productions and commenced their review of the same. Since the filing of the parties' last joint status letter on November 15, 2024 (ECF No. 223), Plaintiffs served their fourth set of document requests ("Fourth RFPs") on each Defendant on December 4, 2024. Defendants served their responses and objections to Plaintiffs' Fourth RFPs on January 3, 2025. The parties are meeting and conferring as to Defendants' production of documents responsive to Plaintiffs' Fourth RFPs. The parties have previously negotiated parameters for their respective productions of documents responsive to all sets of document requests that were served by Plaintiffs or Defendants prior to December 4, 2024. Per the Court's Amended Fact Discovery Schedule, document productions shall be substantially completed by January 31, 2025. All productions of documents responsive to requests for production served by December 4, 2024 shall be completed by February 28, 2025. Initial privilege logs shall be served by February 28, 2025, which shall reflect all withholdings of documents responsive to requests for production served by the parties as of November 8, 2024.

The parties continue to discuss various issues, but do not require Court intervention at this time to address any discovery matters. The parties are currently discussing a stipulated deposition protocol and protocol for the logging of certain privileged documents. To date, no party has served any subpoena or other discovery request on any third party. No depositions have been noticed or taken.

The parties appreciate the Court's time and attention to this matter. We are available at the Court's convenience to address any questions.

Respectfully submitted,

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